

FILED

IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA

Alexandria Division

2019 JUN 13 A 9:51

U.S. DISTRICT COURT
ALEXANDRIA, VIRGINIA

IN RE:) UNDER SEAL
) (Pursuant to Local Criminal Rule 49 and
) Fed. R. Crim. P. 6(e))
GRAND JURY CASE NO. 10-GJ-3793)
) Case No. 1:19-DM-12
)
) GRAND JURY NO. 19-3
)

UNOPPOSED MOTION TO UNSEAL

The United States, through undersigned counsel, hereby moves to unseal specific filings in the above-captioned case. Specifically, the government requests that the following documents be unsealed:

- Dkt. No. 1 – Government’s Application for Compulsion Order
- Dkt. No. 2 – Order Granting Application for Compulsion Order
- Dkt. No. 4-1 – Exhibit A-Part 1 to Government’s Bench Memorandum
- Dkt. No. 4-2 – Exhibit A-Part 2 to Government’s Bench Memorandum
- Dkt. No. 4-7 – Exhibit E to Government’s Bench Memorandum
- Dkt. No. 4-8 – Exhibit F to Government’s Bench Memorandum
- Dkt. No. 4-10 – Exhibit H to Government’s Bench Memorandum
- Dkt. No. 4-11 – Exhibit I to Government’s Bench Memorandum
- Dkt. No. 4-12 – Exhibit J to Government’s Bench Memorandum
- Dkt. No. 4-13 – Exhibit K to Government’s Bench Memorandum
- Dkt. No. 4-14 – Exhibit L to Government’s Bench Memorandum
- Dkt. No. 4-15 – Exhibit M to Government’s Bench Memorandum
- Dkt. No. 4-17 – Exhibit O to Government’s Bench Memorandum
- Dkt. No. 5 – Government’s Response in Opposition to Chelsea Manning’s Motions
- Dkt. No. 5-2 – Exhibit 2 to Government’s Response in Opposition to Chelsea Manning’s Motions
- Dkt. No. 7 – Chelsea Manning’s Motion to Quash
- Dkt. No. 8 – Minute Entry
- Dkt. No. 8-1 – Documents Received in Open Court

The government also requests that the Court unseal this motion and proposed order.

The government requests that the following documents remain under seal because they contain matters occurring before the grand jury and/or disclose information from materials filed under seal in the Fourth Circuit (Case No. 19-1287) or in front of Judge Hilton (Case No. 1:19-DM-3):

- Dkt. No. 3 – Government’s Ex Parte Submission
- Dkt. No. 3-1 – Exhibit A to Government’s Ex Parte Submission
- Dkt. No. 3-2 – Exhibit B to Government’s Ex Parte Submission
- Dkt. No. 4 – Government’s Bench Memorandum
- Dkt. No. 4-3 - Exhibit B to Government’s Bench Memorandum
- Dkt. No. 4-4 - Exhibit C to Government’s Bench Memorandum
- Dkt. No. 4-5 - Exhibit D-Part 1 to Government’s Bench Memorandum
- Dkt. No. 4-6 - Exhibit D-Part 2 to Government’s Bench Memorandum
- Dkt. No. 4-9 - Exhibit G to Government’s Bench Memorandum
- Dkt. No. 4-16 - Exhibit N to Government’s Bench Memorandum
- Dkt. No. 5-1 – Exhibit 1 to Government’s Response in Opposition to Chelsea Manning’s Motions
- Dkt. No. 10 – Government’s Ex Parte Memorandum

The government will file a redacted version of the Government’s Bench Memorandum (Dkt. No. 4) with the Clerk’s Office for public docketing.

Ms. Manning has requested, through counsel, that Dkt. No. 6 (Chelsea Manning’s Motion for Disclosure of Electronic Evidence) remain under seal because it contains a declaration with personal information that should not be in the public domain. The government does not oppose Ms. Manning’s request. Ms. Manning’s attorneys have informed the government that they will file a version of the pleading that does not contain the declaration with the Clerk’s Office for public docketing.

The government has conferred with counsel for Ms. Manning, who stated that they do not oppose this motion.

For the foregoing reasons, the government requests that the Court enter the attached order granting this Motion to Unseal.

Respectfully submitted,

G. Zachary Terwilliger
United States Attorney

By:



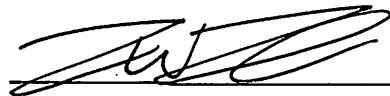
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CERTIFICATE OF SERVICE

I hereby certify that on the 13th day of June, 2019, I caused the foregoing document to be sent to the following via electronic mail:

Moira Meltzer-Cohen
Attorney at Law
Mo_at_Law@protonmail.com

Christopher Leibig
Attorney at Law
Chris@chrisleibiglaw.com

A handwritten signature in black ink, appearing to read 'T. W. Traxler', is written over a horizontal line.

Thomas W. Traxler
Assistant United States Attorney